

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

-----X

In re:	:	
	:	CHAPTER 13
KIM D. MOODY	:	
	:	
Debtor	:	
SPECIALIZED LOAN SERVICING, LLC, et al	:	
	:	
Movant	:	CASE NO.: 19-10110-elf
VS.	:	
	:	
KIM D. MOODY	:	
	:	11 U.S.C. §362
WILLIAM C. MILLER	:	
	:	
Respondent(s)	:	
	:	

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**OBJECTIONS/RESPONSE TO CREDITOR'S MOTION FOR RELIEF
FROM STAY PURSUANT TO 11 U.S.C SECTION 362(d)(1)**

Debtor in this matter, by and through the undersigned counsel responds to the instant Motion and states the following grounds therefore:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied as stated. Debtor has taken all steps required by him under law to this point in this case and is in the process of correcting any payment issues concerning this Mortgage loan.

5. Admitted.

6. Admitted.

7. Denied as stated. Debtor has taken all steps required by him under law to this point in this case and is in the process of correcting any payment issues concerning this Mortgage loan.

8. Denied. Movant has not demonstrated in any manner that said averment is true and correct.

9. Denied. Debtor, is in the process of correcting any payment issues concerning her Chapter 13 Payments.

10. Denied as a conclusion of law. Therefore, the requested relief is premature.

11. Denied. Movant has not demonstrated in any manner that said averment is true and correct.

WHEREFORE, Debtors pray that Movant's Motion be denied, and for such other further relief the Court deems just and proper.

Date: May 24, 2019
Philadelphia, Pennsylvania

/s/ Robert Leite-Young
Robert Leite-Young, Esquire
Attorney for Debtor
6950 Castor Avenue
Philadelphia, Pa 19149
(267) 388-9972
Rleite@roachleite.com

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CERTIFICATE OF SERVICE

I, Robert Leite-Young, certify that on this 24th day of May 2019, the following Debtor's Response has been served upon the following parties, at the addresses designated by said parties for that purpose via the Court's ECF electronic filing system to the following parties of record:

Rebecca A. Solarz, Esq.
KML Law Group, P.C.
701 Market Street, Ste 5000
Philadelphia, PA 19106

Trustee William C. Miller, Esq.
(electronically)

Date: May 24, 2019
Philadelphia, Pennsylvania

/s/ Robert Leite-Young
Robert Leite-Young, Esquire
Attorney for Debtor

6950 Castor Avenue
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 :
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ORDER DENYING MOVANT MOTION FOR REEF FROM THE AUTOMATIC STAY

AND NOW, this _____ day of _____, 20____, upon consideration of
Movant's Motion pursuant to 11 U.S.C. §362 and Debtor's Response, it is hereby ORDERED
AND DECREED that said Motion is DENIED.

DATED: Philadelphia, Pennsylvania

_____, 2019

Hon. Eric L. Frank
United States Bankruptcy Judge
Eastern District of Pennsylvania